

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

Parisian Novelty Company
Attn: Norman R. Weinberg
3510 South Western Avenue
Chicago, Illinois 60609

Application No.: 73060433

I.D. No.: 031600ECK

Applicant's Designation: IEPAAP941

Date Received: September 17, 2002

Subject: Plastic Printing/Fabricating

Date Issued: January 21, 2003

Expiration Date: January 21, 2008

Location: 3510 S. Western Avenue, Chicago

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of 6 silk screen presses with drying ovens, 4 silk screen presses with UV curing ovens, 1 screen cleaner, 1 boiler, 25 indirect gas-fired heaters, and laminating film manufacturing pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of volatile organic material (VOM) and hazardous air pollutants (HAPs) from the source to less than major source thresholds (i.e., VOM to less than 25 tons per year, and HAPs to less than 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs). As a result, the source is excluded from requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) issued for this location.
- 2a. The Permittee shall meet applicable requirements of the USEPA's revisions to its Chicago Federal Implementation Plan (40 CFR 52.741), as specified in USEPA's letter to Parisian Novelty Co., dated April 14, 1993 (attached).
- b. All records kept by the Permittee, pursuant to the above, shall be available for inspection and copying by the Illinois EPA and USEPA.
3. The screen cleaner is subject to the operating requirements of 35 Ill. Adm. Code 218.182. The solvent vapor pressure shall not exceed 1 mmHg at 68°F, pursuant to 218.182(c) (2) (B).
4. This permit is issued based on emissions of VOM from each process emission unit not exceeding 8 lb/hr, pursuant to 35 Ill. Adm. Code 218.301.

- 5a. Total combined emissions and material usage from 6 ilk screen presses with drying ovens, 4 silk screen presses with UV curing ovens, 1 screen cleaner and laminating film manufacturing (including any VOM and HAP emissions associated with clean-up operations) shall not exceed the following limits:

i.	VOM Usage		VOM Emissions	
	(Lb/Mo)	(Tons/Yr)	(Lb/Mo)	(Tons/Yr)
	4,980	24.5	4,980	24.5
ii.	Combined HAP Usage		Combined HAP Emissions	
	(Lb/Mo)	(Tons/Yr)	(Lb/Mo)	(Tons/Yr)
	4,980	24.5	4,980	24.5
iii.	Single HAP ¹ Usage		Single HAP ¹ Emissions	
	(Lb/Mo)	(Tons/Yr)	(Lb/Mo)	(Tons/Yr)
	2,000	9.5	2,000	9.5

¹ Single HAP means any individual HAP listed in Section 112(b) of the Clean Air Act as amended in 1990 (e.g., xylenes, toluene (toluol), hexone (MIBK), ethyl benzene, etc.).

These emissions are based on maximum usage rates and 100% of the VOM and HAPs used being emitted.

- b. The emissions of HAPs as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit at its time of issuance is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
- 6a. Compliance with the annual limits for all operations shall be determined using a running total of the previous 12 months of data.
- b. Compliance with the monthly average and annual limits shall be determined on at least a monthly basis.
- c. Monthly emission calculations shall be made of the total emissions of VOM, total combined HAPs, and of single HAPs using the data specified in the record-keeping requirements of this permit, e.g., usage, density, and weight percent VOM and HAP content.
- d. The monthly calculation of the emissions of VOM and HAPs shall be made using the VOM and HAP content as determined through the testing of the coating or solvent consistent with that specified in this permit.

- 7a. The Permittee shall maintain data on representative coatings, determined by laboratory analysis, in accordance with the procedures of 35 Ill. Adm. Code Section 218.105.
- b. Within 30 days of a written request from the Illinois EPA, the Permittee shall submit data which includes the weight percent VOM and HAP content of the coatings and solvents, a justification of why these are representative, and a description of the sampling procedures and documentation for the analysis.
8. The Permittee shall collect, calculate and record the following information on at least a monthly basis:
 - a. A list giving the name and identification number of each coating, solvent, clean-up solvent, and any other material used containing VOM and/or HAP;
 - b. VOM content in pounds VOM per gallon of coating as applied (minus water and any compounds which are specifically exempt from the definition of VOM) for each coating used;
 - c. Actual usage rate of each material containing VOM and/or HAP, in gallons per month;
 - d. The calculated monthly and annual usage, in pounds of VOM and pounds of HAP; and
 - e. Emissions of VOM, total combined HAPs, and of single HAPs on a monthly and 12 month running total basis in pounds per month, and tons per year.
- 9a. Total combined emissions and natural gas usage from the 4 ovens, 1 boiler and 25 indirect gas-fired heaters shall not exceed the following limits:

				E M I S S I O N S		
Natural Gas Usage		Carbon Monoxide		Nitrogen Oxides		Volatile Organic
<u>Million Ft³/Mo</u>	<u>(Million Ft³/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>Material (T/Yr)</u>
1.1	11.0	0.05	0.5	0.06	0.6	0.03

These limits are based on standard emission factors (AP-42) and maximum operating rates. Compliance with the annual limits for the natural gas usage shall be determined using a running total of 12 months of data.

- b. Natural gas shall be the only fuel utilized at this source.
- c. Compliance with the annual fuel combustion and NO_x emission limits shall be determined from a rolling total of the previous 12 months of data.
10. The Permittee shall collect and record the following items for the fuel combustion emission units: natural gas usage (monthly and running previous 12 month total in million ft³ burned).
11. All records and logs required by this permit shall be retained at a readily accessible location at the plant for at least 3 years from the date of entry, and they shall be made available for inspection and

copying by the Illinois EPA or the USEPA upon request. Any records retained in an electronic format (e.g. computer) shall be capable of being retrieved and printed on paper during the normal office hours of the source, so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.

12. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the record keeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
13. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

14. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: natural gas usage (monthly and running previous 12 month total in million ft³ burned). Usage and emissions of VOM, combined HAPs and single HAP (monthly and running previous 12 month totals in tons/mo and ton/yr).

Please note that the buffing machine is exempt from state permitting requirements pursuant to 35 Ill. Adm. Code 201.146(aa).

If you have any questions on this, please call Randy Solomon at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

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cc: Illinois EPA, Field Operations Section, Region 1
Illinois EPA, Compliance Section
USEPA
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from this manufacturing facility operating in compliance with the requirements of this federally enforceable permit. In preparing this permit and summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a facility. The maximum emissions are well below the levels at which the source would be considered a major source for purposes of the CAAPP. Actual emissions from this source will be less than in this summary since less solvents are used than specified in this permit.

- 1a. Total combined emissions and material usage from 6 ilk screen presses with drying ovens, 4 silk screen presses with UV curing ovens, 1 screen cleaner and laminating film manufacturing (including any VOM and HAP emissions associated with clean-up operations) shall not exceed the following limits:

i.	VOM Usage		VOM Emissions	
	<u>(Lb/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Lb/Mo)</u>	<u>(Tons/Yr)</u>
	4,980	24.5	4,980	24.5
ii.	Combined HAP Usage		Combined HAP Emissions	
	<u>(Lb/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Lb/Mo)</u>	<u>(Tons/Yr)</u>
	4,980	24.5	4,980	24.5
iii.	Single HAP ¹ Usage		Single HAP ¹ Emissions	
	<u>(Lb/Mo)</u>	<u>(Tons/Yr)</u>	<u>(Lb/Mo)</u>	<u>(Tons/Yr)</u>
	2,000	9.5	2,000	9.5

¹ Single HAP means any individual HAP listed in Section 112(b) of the Clean Air Act as amended in 1990 (e.g., xylenes, toluene (toluol), hexone (MIBK), ethyl benzene, etc.).

These emissions are based on maximum usage rates and 100% of the VOM and HAPs used being emitted.

- b. The emissions of HAPs as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit at its time of issuance is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.

2. Total combined emissions and natural gas usage from the 4 ovens, 1 boiler and 25 indirect gas-fired heaters shall not exceed the following limits:

		E M I S S I O N S				
Natural Gas Usage		Carbon Monoxide		Nitrogen Oxides		Volatile Organic Material
<u>Million Ft³/Mo</u>	<u>(Million Ft³/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(T/Yr)</u>
1.1	11.0	0.05	0.5	0.06	0.6	0.03

These limits are based on standard emission factors (AP-42) and maximum operating rates. Compliance with the annual limits for the natural gas usage shall be determined using a running total of 12 months of data.

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